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8	Attorneys for Defendant Digestive		
	Disease Center		
n I	I		

UNITED STATES DISTRICT COURT DISTRICT OF NEVADA

LUANNE AUSTIN individually, on behalf of herself and all other similarly situated,

Plaintiffs

VS.

ALLIED COLLECTION SERVICES, INC.; TEACHERS HEALTH TRUST *DBA* THT HEALTH; and DIGESTIVE DISEASE CENTER *DBA* DIGESTIVE DISEASE SPECIALISTS

Defendants

Case No: 2:21-cv-01593-CDS-NJK

STIPULATION AND ORDER TO
EXTEND TIME TO RESPOND TO
DEFENDANT TEACHERS HEALTH
TRUST AND PLAINTIFF LUANNE
AUSTIN'S JOINT MOTION FOR
DETERMINATION OF GOOD FAITH
SETTLEMENT

Defendant Teachers Health Trust ("THT") and Plaintiff Luanne Austin, individually on behalf of herself and all others similarly situated ("Plaintiffs") and Defendant Digestive Disease Center *dba* Digestive Disease Specialists ("DDS") (collectively the "Parties"), by and through their undersigned counsel, for good cause shown, hereby stipulate and agree to extend DDS's deadline to response to Defendant Teachers Health Trust and Plaintiff Luanne Austin's Joint Motion for Determination of Good Faith Settlement to April 6, 2023, for the following reasons:

- 1. On March 8, 2023, Defendant Teachers Health Trust and Plaintiff Luanne Austin filed and served their Joint Motion for Determination of Good Faith Settlement.
 - 2. DDS's deadline to file a responsive pleading is March 22, 2023.

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This is the first stipulation for extension of time to file DDS's response to THT and

HAYES | WAKAYAMA | JUAN

2	Plaintiffs Joint Motion for Determination of Good Faith Settlement.		
3	4. The Parties stipulate to this extension of time in order to continue in efforts to		
4	resolve this dispute without incurring additional fees and costs.		
5	5. This extension request is sought in good faith and is not made for the purpose of		
6	delay.		
7	Therefore, the Parties respectfully request an extension for DDS to respond to THT and		
8	Plaintiffs' Joint Motion for Determination on Good Faith Settlement up to and including April 6		
9	2023.		
10	IT IS SO STIPULATED.		
11	Dated this 22 nd day of March, 2023.	Dated this 22 nd day of March, 2023.	
12	HAYES WAKAYAMA JUAN	MADDOX & CISNEROS, LLP	
13	By:/s/ Jeremy D. Holmes, Esq. LIANE K. WAKAYAMA, ESQ.	By:/s/Norberto J. Cisneros, Esq. NORBERTO J. CISNEROS, ESQ.	
14	Nevada Bar No. 11313 JEREMY D. HOLMES, ESQ.	Nevada Bar No. 8782 1210 S. Valley View Boulevard, Suite 202	
15	Nevada Bar No. 14379	Las Vegas, Nevada 89102	
16	5798 S Durango Drive, Suite 105 Las Vegas, Nevada 89113	Attorneys for Plaintiffs, Luanne Austin, on behalf of herself and all other similarly	
17	Attorneys for Defendant Digestive Disease Center	situated	
18	Dated this <u>22nd</u> day of March, 2023.		
19	SNELL & WILMER LLP		
20	By:/s/John S. Delikanakis, Esq.		
21	JOHN S. DELIKANAKIS, ESQ. Nevada Bar No. 5928		
22	JOSEPH G. ADAMS, ESQ.		
23	(admitted pro hac vice) CHRISTIAN P. OGATA, ESQ.		
24	Nevada Bar No. 15612 3883 Howard Hughes Parkway, Suite 1100	IT IS SO ORDERED:	
25	Las Vegas, Nevada 89169		
26	Counsel for Teachers Health Trust dba <u>THT Health</u>	4pm	
27		UNITED STATES DISTRICT JUDGE	

DATED: <u>March 27, 2023</u>